



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 2, 2016

Mr. Ernie Howard, Owner
Triple J Towing & Recovery, LLC
2115 Hayes Avenue
Fremont, Ohio 43420

Re: Triple J Towing & Recovery LLC
Notice of Violation (NOV)
Related Correspondence
RCRA C - Hazardous Waste
Sandusky County
OHR000128918

Hazardous Waste Program - DERR
Subject: FCI, Inspection Report Transmittal Letter

Dear Mr. Howard:

Thank you for accompanying me during Ohio EPA's October 31, 2016 and November 1, 2016, Focused Compliance Inspection (FCI) of Triple J Towing & Recovery, LLC (TJT) located at 2115 Hayes Avenue, Fremont, Ohio. My inspection included a review of TJT's operations.

On November 10, 2016, Ohio EPA sent you a Notice of Violation letter outlining the violation that was observed during the October 31, 2016, and November 1, 2016, inspection. This letter includes a copy of that November 10, 2016, NOV along with the complete inspection report.

Since the analytical results you provided for the containers of waste at the property documented the presence of polychlorinated biphenyls (PCBs), Ohio EPA recommends that you contact the U.S. Environmental Protection Agency Region 5 PCB coordinator, Peter Ramanauskas, by phone at (312) 886-7890 or (800) 621-8431, or by email at ramanauskas.peter@epa.gov, for assistance in managing any waste or media containing PCBs at TJT.

Please be advised that this inspection report is only associated with those areas of the operations that were inspected or documentation reviewed and does not constitute a waiver of potential violations not discovered.

You can find Ohio's Hazardous Waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dmwm/Home.aspx>

Should you have any questions, please contact me at (419) 373-3015 or Ed.Pulido@epa.ohio.gov.

Sincerely,

Edgar V. Pulido
NWDO, HW-DERR
Environmental Specialist II
/mrf

Enclosure

pc: Colleen Weaver, HW-DERR-NWDO (w/ enclosure)

ec: Colleen Weaver, HW-DERR-NWDO
Tammy McConnell, HW-DERR-CO

Michael Reiser, DMWM-NWDO

**DIVISION OF MATERIALS and WASTE MANAGEMENT
INSPECTION REPORT FORM
OHIO EPA**

FACILITY	Triple J Towing & Recovery, LLC	US EPA ID#	OHR000128918
INSPECTION DATE	10/31/2016 and 11/01/2016	Generator Status	Used oil generator
Facility Contact (s)	Ernie Howard, Owner	(419) 332-9088	
	Tracey Thompson, Office Manager	(419) 332-9088	
EPA Inspector (s)	Ed Pulido, ES2, NWDO	(419) 373-3015	

PURPOSE OF INSPECTION

An unannounced Focused Compliance Inspection ("FCI") of Triple J Towing & Recovery, LLC (hereinafter "TJT" or "facility") located at 2115 Hayes Avenue, Fremont, Ohio, took place on October 31, 2016, and November 1, 2016. The FCI was conducted by the Ohio Environmental Protection Agency ("OEPA") as a follow-up evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act ("RCRA") and its implementing regulations found in the Ohio Administrative Code.

ARRIVAL ON-SITE

On October 31, 2016, I arrived at TJT at 12:54 pm. I stepped in the office. I introduced myself and ask to talk to Ernie Howard. While waiting to talk to Mr. Howard, I talked to Ms. Tracey Thompson, TJT Office Manager. I showed Ms. Thompson my business card and EPA ID. I described the purpose of the RCRA focused inspection and the process by which I would conduct the inspection, including an entrance interview, facility walk-through which would include photographs, and I would conclude with an exit interview.

ENTRANCE INTERVIEW

After Mr. Howard arrived, I stated that the purpose of the RCRA focused inspection was to follow-up on an analytical report submitted to the Ohio EPA, indicating the presence of PCB containing waste and lead contaminated hazardous waste (D009). In addition, I stated that I will evaluate the conditions of the drums containing the waste. Mr. Howard stated that TJT is salvage yard and provides towing services. Auto fluids that are recovered from the cars during engine and transmission removal, are store on site and send off-site to be recycled. The facility has approximately 600 cars at this time. Some of the cars are kept for parts but most of the cars are sold for scrap. Furthermore, I stated that on May 29, 2015, Ohio EPA issues a notice of violation letter to RJT for failure to evaluate unknown waste found in 55-gallon drum and failure to label used oil storage containers. Subsequently, On October 5, 2015, Ohio EPA received a letter from Mr. Rick

Farmer, a previous operator of the junk yard, that stated that all the drums remaining at the site as of December 2011, when he left the property, contained used motor oil and anti-freeze. Based on this information and photographs showing proper labeling of used oil storage containers, Ohio EPA issued a letter of return to compliance on October 28, 2015, correcting all violation found during the complaint investigation on April 22, 2015. As previously stated, On October, 2016, TJT send an email to Ohio EPA, including an analytical report indicating the presence of PCBs above 50 ppm and high level of lead contamination. The Ohio EPA has concluded that the waste stored in 55-gallon drums previously thought to be used oil, is not and it should be properly evaluated at this point to determine if is hazardous or not.

FACILITY WALK-THROUGH

On 10/31/2016. After completing the entrance interview, Mr. Howard, Ms. Thompson, and Mr. Ed Runion, TJT employee, accompanied me in a walk-through of the camp. First, we walked outside the back of the office building and I observe an area of oil staining. Ms. Thompson stated that the waste drums were staged in this area prior to being moved into the nearby shed and trailer. Some of the drums were left outside under a tarp. Ms. Thompson stated that a partially damaged steel drum was over-packed in the staging area.



Triple J Towing & Recovery Office Building – Front



10 Waste Drums in Steel Trailer

Next, I observed the waste drums inside and outside the wooden barn near the office building. Mr. Howard stated that there are approximately seventy-five 55-gallon drums including some drums inside a metal trailer near the wooden barn.



Wooden Barn Storage Area



Drum Located inside the barn and outside under a tarp



Drums Inside the Wooden Barn



Drums inside the wooden barn



Waste Drums Out the Wooden Barn

On November 1, 2016, I returned to the site and conducted an entire walk-through the salvage yard. We walked counter clockwise. I took photographs of the walkways in the yard and of areas where the waste drums have been removed from. Ms. Thompson stated that all the drum that were removed from the field, have been present prior to TJT start operation at the facility.



Area Outside Office Building



Area Near Office



Drum Staging Area – Evidence of Oil Contamination Observed



Junk Yard Isle – SW, Evidence of Oil Contamination Observed



Junk Yard Isle -- South



Drum Area -- NW



Drum Area -- NW



Junk Yard -- West



Junk Yard -- West



Drum Area -- SW, Evidence of Oil Contamination Observed



Drum Area – SW, Evidence of Oil Contamination Observed



Drum Area – SW, Evidence of Oil Contamination Observed



Junk Yard -- SE



Junk Yard -- SE



Junk Yard -- SE



Junk Yard -- SE



Junk Yard -- East



Junk Yard -- East



Junk Yard -- East



Junk Yard -- East



Junk Yard -- East



Junk Yard -- East



Junk Yard -- East



Junk Yard -- East



Junk Yard – Drum Storage Barn



Junk Yard – Near Office Building

FACILITY RECORDS			
N/A			
EXIT INTERVIEW			
After completing the walk-through, I told Mr. Howard that I will follow-up with a letter summarizing my observations and including any direction of to handle the waste drums.			
Post Inspection Follow-up			
11/10/2016 – Colleen Weaver and I participated in a conference call with Mr. Ernie Howard and Ms. Tracey Thompson. I informed Mr. Howard that a 3745-52-11 violation will be included in a notice of violation letter that I will send to the facility. We explained that Ohio EPA does not think that TJP has adequately evaluated the drum of waste.			
CHECKLIST COMPLETED			
Generator Checklist:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	LDR Checklist	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Universal Waste:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Used Oil Checklist	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
CRO	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Other Checklist	
Attachments			
N/A			